

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THOMAS R. AHERN,
Plaintiff,

vs.

SIG SAUER, INC. and CITY
OF CAMBRIDGE,
Defendants.

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) C.A. No.: 1:21-CV-11007-DJC
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**DEFENDANT CITY OF CAMBRIDGE’S MOTION TO IMPOUND
PLAINTIFF’S PROFESSIONAL STANDARDS INTERVIEW TRANSCRIPT**

Pursuant to Local Rule 7.2, Defendant City of Cambridge (“City”) moves to impound what have been marked as Exhibit L and Exhibit M to be filed with its Motion for Summary Judgment with respect to Plaintiff Thomas R. Ahern (“Plaintiff”). The City’s Motion for Summary Judgment will be filed on or before March 8, 2024.

In support of this Motion, the City states the following:

1. In this litigation, the deposition of Plaintiff took place on June 8, 2023 and June 27, 2023, and the deposition of Silverio Ferreira (“Ferreira”) took place on October 11, 2023.
2. A transcript of an interview of Plaintiff previously conducted by the Cambridge Police Department’s Professional Standards Unit was marked as an exhibit at both Plaintiff’s and Ferreira’s respective depositions.
3. The copies of the interview transcript marked as exhibits at Plaintiff’s and Ferreira’s depositions are stamped with a “confidential information” marking.
4. For the purposes of the City’s Motion for Summary Judgment, the copy of the interview transcript marked as an exhibit at Plaintiff’s deposition is marked as Exhibit L for this

Motion to Impound and the copy of the interview transcript marked as an exhibit at Ferreira's deposition is marked as Exhibit M for this Motion to Impound.

5. A protective order was entered in this case on July 11, 2022. Under the terms of that order, the parties agreed that "[i]f a party desires to file anything with the Court that includes CONFIDENTIAL INFORMATION . . . that party must move in advance of that filing to impound that information in accordance with Local Rule 7.2." Docket Entry No. 54, Para. 7.
6. Consistent with the above referenced protective order, the City moves to impound Exhibit L and Exhibit M.¹

WHEREFORE, the City respectfully requests that the Court permit the impoundment of Exhibit L and Exhibit M.

Dated: March 6, 2024

DEFENDANT, CITY OF CAMBRIDGE

By its attorneys,

/s/ Sean M. McKendry

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¹ On March 6, 2024, Plaintiff's counsel assented, via email, to the impoundment of the transcript of the interview of the Plaintiff conducted by the Cambridge Police Department's Professional Standards Unit.

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a), counsel for the Defendant City of Cambridge hereby certifies that he has, in good faith, conferred with counsel for the Plaintiff prior to the filing of this motion.

/s/ Sean M. McKendry
Sean M. McKendry

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: March 6, 2024

/s/ Sean M. McKendry
Sean M. McKendry